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GEORGIA AGRIBUSINESS COUNCIL

COUNCIL MISSION: "To advance the business of agriculture through economic development, environmental stewardship and education to improve the quality of life for all Georgians."

July 28, 2009

Dr. Carol Couch
Georgia Environmental Protection Division
2 Martin Luther King Jr. Drive
Suite 1152
Atlanta, GA 30334

Dr. Couch:

The Georgia Agribusiness Council is pleased to provide the following additional comments on the Water Conservation Implementation Plan (WCIP). While the current proposal is improved, we respectfully request attention to several critical concerns that remain.

With the goal in mind of drafting a useable guidance document from Georgia's state environmental protection leadership, here are several issues that we believe should be addressed and/or eliminated from the document.

1. We strongly believe that references to "global climate change" have no place in this document (Pg. 10 and 17) and should be deleted.
2. The document contains no references to water augmentation (reservoirs) or to the need for development of a Water Supply Augmentation Plan. Conservation and augmentation are compatible and deserve equal consideration.
3. References to energy planning and the concept of conserving energy to conserve water (pg. 28) are far-reaching and out of place. Such references should be deleted.
4. With a common theme of setting the stage for proposed regulatory changes, we suggest adding a chapter reference to the types of policy changes being sought and a preview of which ones will or could be actions by the Board of Natural Resources or the Georgia General Assembly.
5. Agricultural water use data (pg. 32) should be consistent with the data collected from actual irrigation flow meters and with oversight and approval of the GA Soil & Water Conservation Commission.
6. We reject the reference that agriculture irrigation is "100% consumptive" as stated on pg. 33. Such a statement is fundamentally flawed and should be deleted in our view.
7. Numerous "benchmarks" and "best practices" listed are proposed without cost/benefit analysis or production impact analysis. For example, on pg. 43, the reference to "irrigation scheduling" in Benchmark 2C appears to be of an aspiration rather than practical. Benchmark 3B on pg. 45 appears to challenge each farmer to have at least 50% of their cropland in conservation tillage. If deletion is not an option, we would be happy to assist in



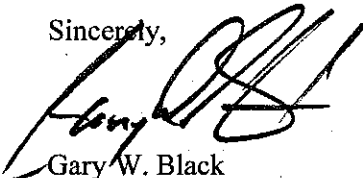
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salvaging this reference with more suitable language. On page 49, Best Practice 10 Variable Rate Irrigation, is very expensive technology. Best Practice 12 actually requests that fields under center pivot irrigation be farmed in "pie-shaped segments" to best utilize irrigation application. Such a comment is highly impractical and should be eliminated. Best Practice 14 regarding the use of "high pressure spray guns" on fixed and traveler irrigation systems assumes these are bad systems without factoring in farm or crop need or production cost. BP 14 should be deleted. The same is true for Best Practice 16 "timer-only irrigation controls." Such controls are indeed convenient and cost-effective, but the characterization of them being "unresponsive to the actual water need of the crop" is flawed in that the producer will manage water application to enhance crop production and/or limit plant stress. BP 16 should be deleted.

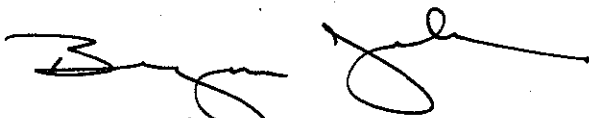
8. We request Best Practice 21 "Conservation Tillage" (pg. 52) be reworded. It currently states that certain row crop farmers should "especially consider" conservation tillage. Each farm has different pressures from year to year. These include pests (insects, diseases, weeds, etc.) nutrients, soil conditions, crop variety, etc. General consideration of conservation tillage practices is important from year to year, regardless of the particular crop being grown.

The Georgia Agribusiness Council fully supports the statewide water planning process. Further, we believe the Regional Water Councils need the best and most appropriate, vetted information to do their work effectively. The WCIP is critical in this planning process and for developing regulations that move our state forward. Thank you for the opportunity to share or comments and suggestions. Please call on us if we can be of further assistance.

Sincerely,



Gary W. Black
President



Bryan R. Tolar
Vice President of Public Affairs